

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Tri-State Paper, Inc.,

Debtor.

Case No. 23-13237-pmm

Chapter 11

Tri-State Paper, Inc.,

Plaintiff,

v.

Raymond V. Barkmeyer,  
Amy Volpe, Joanne E. Barkmeyer,  
and Michael Volpe,

Defendants.

Adversary No. 23-00072-pmm

**Plaintiff's Request for Entry of Default Against Defendants Raymond V.  
Barkmeyer, Amy Volpe, Joanne E. Barkmeyer, and Michael Volpe**

To the Clerk of Court:

Defendants Raymond V. Barkmeyer, Amy Volpe, Joanne E. Barkmeyer, and Michael Volpe have failed to appear, plead, or otherwise defend against Plaintiff Tri-State Paper, Inc.'s complaint for judgment for affirmative relief within the time allowed and is therefore in default as evidenced by the record and the declaration attached as Exhibit A.

Consequently, you must enter default against Defendants Raymond V. Barkmeyer, Amy Volpe, Joanne E. Barkmeyer, and Michael Volpe pursuant to Fed. R. Bankr. P. 7055 and Fed. R. Civ. P. 55(a).

Date: February 12, 2024

CIBIK LAW, P.C.  
*Counsel for Plaintiff*

By: /s/ Michael I. Assad  
Michael A. Cibik (#23110)  
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**Exhibit A  
Declaration in Support of Plaintiff's Request for Entry of Default**

I, Michael I. Assad, declare as follows:

1. I am the attorney for Plaintiff Tri-State Paper, Inc. in the above-entitled action and I am familiar with the file, records, and pleadings in this matter.
2. The complaint was filed on November 6, 2023, and the summons was filed on November 7, 2023.
3. Defendants Raymond V. Barkmeyer, Amy Volpe, Joanne E. Barkmeyer, and Michael Volpe were served with a copy of the summons and complaint on November 7, 2023, as reflected on the docket by the proof of service filed on that date.
4. An answer to the complaint was due on December 7, 2023.
5. The Defendants have failed to appear, plead, or otherwise defend within the time allowed and, therefore, are now in default.
6. The Plaintiff requests that the clerk of court enter default against the Defendants.
7. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Date: February 12, 2024

/s/ Michael I. Assad  
Michael I. Assad (#330937)